Exhibit A

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

MARK T. EDDINGSTON,	§	
JEFFERY M. DAVIS,	§	
ELRIDGE NICHOLAS BOLLICH,	§	
RAY A. COX and GEORGE GALANIS,	§	
	§	
Plaintiffs,	§	Civil Action No. 2:12-CV-00422
	§	
v.	§	
	§	
UBS FINANCIAL SERVICES, INC.,	§	
	§	
Defendant.	§	**JURY TRIAL DEMANDED**

PLAINTIFF, ELRIDGE NICHOLAS BOLLICH'S, ANSWERS TO FIRST AND SECOND SETS OF INTERROGATORIES PROPOUNDED BY DEFENDANT

Plaintiff, Elridge Nicholas Bollich, hereby provides the following answers to Defendant's first and second sets of interrogatories

1. Identify each and every person who assisted you in answering these Interrogatories and in responding to Defendant's First Request for Production of Documents, and specify to which Interrogatory and Document Request and subpart that person provided assistance or input and the nature of such assistance or input.

ANSWER:

I was aided in the answering of these interrogatories by my attorneys, Robert E. Goodman, Jr., Theodore C. Anderson and their paralegal, Tara Mills.

2. For each person you believe has knowledge of any of the facts underlying any of the claims in the Amended Complaint or the subject matter of this litigation, please state: (a) full name, last known home and business addresses and telephone numbers, and relationship to you; (b) current employer and position and, if formerly employed by Defendant, state when and what position; (c) the facts or information which you believe to be the substance of his or her knowledge and the source of such knowledge; and (d) the identity of any documents which relate to the person's information or knowledge, including without limitation any written statements.

ANSWER:

I am the only individual with knowledge of the underlying facts in the Amended Complaint as they apply to me.

3. Identify each and every person, other than your attorneys, with whom you have discussed the allegations in the Amended Complaint or the subject matter of this litigation, and for each such person, please state: (a) the full name, last known home and business addresses and telephone numbers, and relationship to you; (b) when and where the discussion(s) or communication(s) took place; (c) the identity of each person present during such discussion(s) or

ANSWER:

I have had no discussions other than those involving other Plaintiffs in this action.

4. Identify each person from Defendant who, either individually or as part of a group, communicated with you, orally or in writing, regarding the Plan. For each such person, specify the nature of the communication; the date when the communication took place; what the individual said about the Plan; what statements, if any, you made during the communication; witnesses, if any, to the communication(s); and any notes or documents relating to the communication(s).

ANSWER:

I object to this interrogatory on the ground that the request seeks information that is not relevant in that it requests information related to the merits of the case rather than the issue of class certification. Subject to and without waiving the foregoing objection none.

5. Identify in detail your calculations as to damages and any other relief to which you believe you are entitled and for which you seek redress against Defendant, and for each element of damages or other relief identify: (a) each and every fact upon which you base your entitlement contention; (b) all documents relating or referring to any facts which form the bases of your entitlement contention; (c) each and every person who may have knowledge of the facts underlying your entitlement contention; and (d) each and every document relating to your alleged damages and any other information provided in your answer to this Interrogatory.

ANSWER:

I object to this interrogatory as overly broad and burdensome. The information is possessed and known by Defendant. Subject to and without waiving the foregoing objection, Firm Contributions, Market Interest and Turbo Interest forfeited as calculated by The Newport Group are the basis for my damage calculations. I am attaching a copy of the forfeiture calculation.

6. Identify any person (other than counsel) from whom you or your attorneys have obtained or will obtain a written statement of any kind relating to any fact, allegation, claim, issue or

defense raised in this action. For each such person, describe the substance of such statements. Identify all documents relating to same.

ANSWER:

I object to this interrogatory on the ground that the request seeks information that is not relevant in that it requests information related to the merits of the case rather than the issue of class certification. Subject to and without waiving the foregoing objection, I have not identified any such individuals at this time.

7. If, in support of your claims as described in the Amended Complaint, you rely on any specific communications or documents which you contend directly evidence or support your allegations, identify each and every such communication or document.

ANSWER:

I object to this interrogatory on the ground that the request seeks information that is not relevant in that it requests information related to the merits of the case rather than the issue of class certification. Subject to and without waiving the foregoing objection, the documents relied on in support of my claim as described in the Amended Complaint are those referred to in the Amended Complaint and the document referred to in my answer to Interrogatory No. 5.

8. If you contend that Defendant, by any of its officers, agents managers, or employees, has made any admissions or declarations against interest concerning the subject matter of this action, please identify the person making the statement and identify the statement allegedly made (and if in writing, attach a copy).

ANSWER:

I object to this interrogatory on the ground that the request seeks information that is not relevant in that it requests information related to the merits of the case rather than the issue of class certification. Subject to and without waiving the foregoing objection, such persons have not been identified at this time.

9. Describe in detail any communications with potential class members regarding this litigation. For each such person, specify the nature of the communication, the date when the communication took place, what was said by the potential class member, what statements, if any, you made during the communication, witnesses, if any, and any notes you took of the communication.

ANSWER:

None.

10. Identify each person whom you intend to call as a witness at any hearing or trial in this matter.

ANSWER:

I object to this interrogatory on the ground that the request seeks information that is not relevant in that it requests information related to the merits of the case rather than the issue of class certification. Subject to and without waiving the foregoing objection, I have yet to determine who will be called as a witness at any hearing or trial.

11. Identify all employers (including yourself) who have offered you employment or for whom you have worked since your employment with UBS ended and through the date of trial, identifying: the company name, address, and location; the dates you were employed by such other employers (including yourself); your positions with such employers; your supervisors' names and titles; a brief description of your job duties; your rate of pay as well as earnings, compensation and other benefits you received during such employment; and if you left the employment, the reasons for your separation from employment.

ANSWER:

I object to this interrogatory on the ground that the request seeks information that is not relevant to any claim or defense or calculated to lead to admissible evidence relevant to a claim or defense other than information as to my participation in the PartnerPlus Plan. Subject to and without waiving the foregoing objection, the names of, and dates of my employment, with subsequent employers, this information is readily available to you on FINRA BrokerCheck.

12. For all employers identified in response to the foregoing interrogatory, identify and describe your efforts to become employed with such employer, including each person who recruited you; each person who interviewed you; the date you first expressed interest in employment with the employer; your reasons for seeking employment outside UBS; any pre-employment communications with representatives of the employer; any applications or resumes submitted; and your reasons for accepting such employment.

ANSWER:

I object to this interrogatory on the ground that the request seeks information that is not relevant to any claim or defense or calculated to lead to admissible evidence relevant to a claim or defense other than information as to my participation in the PartnerPlus Plan.

VERIFICATION

STATE OF TEXAS §
§
COUNTY OF HARRIS §

Before me, the undersigned Notary Public, personally appeared Elridge Nicholas Bollich, who, being by me duly sworn, deposed and stated that he is a Plaintiff in this action and that the facts stated in the foregoing Plaintiff, Elridge Nicholas Bollich's, Answers to First and Second Sets of Interrogatories Propounded by Defendant are within his personal knowledge and are true and correct.

Elridge Nicholas Bollich
Elridge Nicholas Bollich

SUBSCRIBED AND SWORN TO BEFORE ME this 27th day of March, 2013.

Rebecca E. Grant
Notary Public

REBECCA E. GRANT
MY COMMISSION EXPIRES
SEPTEMBER 29 2013

REBECCA E. GRANT
MY COMMISSION EXPIRES
SEPTEMBER 29, 2013

Respectfully submitted,

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COUNSEL FOR PLAINTIFFS

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing was served upon Defendant's counsel of record by the method indicated below this 27th day of March, 2013 as follows:

By E-mail and U.S. First Class Mail

Eugene Scalia — escalia@gibsondunn.com
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Theodore C. Anderson

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

MARK T. EDDINGSTON,	§	
JEFFERY M. DAVIS,	§	
ELRIDGE NICHOLAS BOLLICH,	§	
RAY A. COX and GEORGE GALANIS,	§	
	§	
Plaintiffs,	§	Civil Action No. 2:12-CV-00422
	§	
v.	§	
	§	
UBS FINANCIAL SERVICES, INC.,	§	
	§	
Defendant.	§	**JURY TRIAL DEMANDED**

PLAINTIFF, RAY A. COX'S, ANSWERS TO FIRST AND SECOND SETS OF INTERROGATORIES PROPOUNDED BY DEFENDANT

Plaintiff, Ray A. Cox, hereby provides the following answers to Defendant's first and second sets of interrogatories

1. Identify each and every person who assisted you in answering these Interrogatories and in responding to Defendant's First Request for Production of Documents, and specify to which Interrogatory and Document Request and subpart that person provided assistance or input and the nature of such assistance or input.

ANSWER:

I was aided in the answering of these interrogatories by my attorneys, Robert E. Goodman, Jr., Theodore C. Anderson and their paralegal, Tara Mills.

2. For each person you believe has knowledge of any of the facts underlying any of the claims in the Amended Complaint or the subject matter of this litigation, please state: (a) full name, last known home and business addresses and telephone numbers, and relationship to you; (b) current employer and position and, if formerly employed by Defendant, state when and what position; (c) the facts or information which you believe to be the substance of his or her knowledge and the source of such knowledge; and (d) the identity of any documents which relate to the person's information or knowledge, including without limitation any written statements.

ANSWER:

I am the only individual with knowledge of the underlying facts in the Amended Complaint as they apply to me.

3. Identify each and every person, other than your attorneys, with whom you have discussed the allegations in the Amended Complaint or the subject matter of this litigation, and for each such person, please state: (a) the full name, last known home and business addresses and telephone numbers, and relationship to you; (b) when and where the discussion(s) or communication(s) took place; (c) the identity of each person present during such discussion(s) or

ANSWER:

I have had no discussions other than those involving other Plaintiffs in this action.

4. Identify each person from Defendant who, either individually or as part of a group, communicated with you, orally or in writing, regarding the Plan. For each such person, specify the nature of the communication; the date when the communication took place; what the individual said about the Plan; what statements, if any, you made during the communication; witnesses, if any, to the communication(s); and any notes or documents relating to the communication(s).

ANSWER:

I object to this interrogatory on the ground that the request seeks information that is not relevant in that it requests information related to the merits of the case rather than the issue of class certification. Subject to and without waiving the foregoing objection, I have had no discussions other than those involving other Plaintiffs in this action.

5. Identify in detail your calculations as to damages and any other relief to which you believe you are entitled and for which you seek redress against Defendant, and for each element of damages or other relief identify: (a) each and every fact upon which you base your entitlement contention; (b) all documents relating or referring to any facts which form the bases of your entitlement contention; (c) each and every person who may have knowledge of the facts underlying your entitlement contention; and (d) each and every document relating to your alleged damages and any other information provided in your answer to this Interrogatory.

ANSWER:

I object to this interrogatory as overly broad and burdensome. The information is possessed and known by Defendant. Subject to and without waiving the foregoing objection, Firm Contributions, Market Interest and Turbo Interest forfeited as calculated by The Newport Group are the basis for my damage calculations. I am attaching a copy of the forfeiture calculation.

6. Identify any person (other than counsel) from whom you or your attorneys have obtained or will obtain a written statement of any kind relating to any fact, allegation, claim, issue or defense raised in this action. For each such person, describe the substance of such statements. Identify all documents relating to same.

ANSWER:

I object to this interrogatory on the ground that the request seeks information that is not relevant in that it requests information related to the merits of the case rather than the issue of class certification. Subject to and without waiving the foregoing objection, I have not identified any such individuals at this time.

7. If, in support of your claims as described in the Amended Complaint, you rely on any specific communications or documents which you contend directly evidence or support your allegations, identify each and every such communication or document.

ANSWER:

I object to this interrogatory on the ground that the request seeks information that is not relevant in that it requests information related to the merits of the case rather than the issue of class certification. Subject to and without waiving the foregoing objection, the documents relied on in support of my claim as described in the Amended Complaint are those referred to in the Amended Complaint and the document referred to in my answer to Interrogatory No. 5.

8. If you contend that Defendant, by any of its officers, agents managers, or employees, has made any admissions or declarations against interest concerning the subject matter of this action, please identify the person making the statement and identify the statement allegedly made (and if in writing, attach a copy).

ANSWER:

I object to this interrogatory on the ground that the request seeks information that is not relevant in that it requests information related to the merits of the case rather than the issue of class certification. Subject to and without waiving the foregoing objection, such persons have not been identified at this time.

9. Describe in detail any communications with potential class members regarding this litigation. For each such person, specify the nature of the communication, the date when the communication took place, what was said by the potential class member, what statements, if any, you made during the communication, witnesses, if any, and any notes you took of the communication.

ANSWER:

None.

10. Identify each person whom you intend to call as a witness at any hearing or trial in this matter.

ANSWER:

I object to this interrogatory on the ground that the request seeks information that is not relevant in that it requests information related to the merits of the case rather than the issue of class certification. Subject to and without waiving the foregoing objection, I have yet to determine who will be called as a witness at any hearing or trial.

11. Identify all employers (including yourself) who have offered you employment or for whom you have worked since your employment with UBS ended and through the date of trial, identifying: the company name, address, and location; the dates you were employed by such other employers (including yourself); your positions with such employers; your supervisors' names and titles; a brief description of your job duties; your rate of pay as well as earnings, compensation and other benefits you received during such employment; and if you left the employment, the reasons for your separation from employment.

ANSWER:

I object to this interrogatory on the ground that the request seeks information that is not relevant to any claim or defense or calculated to lead to admissible evidence relevant to a claim or defense other than information as to my participation in the PartnerPlus Plan. Subject to and without waiving the foregoing objection, the names of, and dates of my employment, with subsequent employers, this information is readily available to you on FINRA BrokerCheck.

12. For all employers identified in response to the foregoing interrogatory, identify and describe your efforts to become employed with such employer, including each person who recruited you; each person who interviewed you; the date you first expressed interest in employment with the employer; your reasons for seeking employment outside UBS; any pre-employment communications with representatives of the employer; any applications or resumes submitted; and your reasons for accepting such employment.

ANSWER:

I object to this interrogatory on the ground that the request seeks information that is not relevant to any claim or defense or calculated to lead to admissible evidence relevant to a claim or defense other than information as to my participation in the PartnerPlus Plan.

VERIFICATION

STATE OF OREGON §
§
COUNTY OF JACKSON §

Before me, the undersigned Notary Public, personally appeared Ray A. Cox, who, being by me duly sworn, deposed and stated that he is a Plaintiff in this action and that the facts stated in the foregoing Plaintiff, Ray A. Cox's, Answers to First and Second Sets of Interrogatories Propounded by Defendant are within his personal knowledge and are true and correct.

Ray A. Cox

SUBSCRIBED AND SWORN TO BEFORE ME this 27th day of March, 2013.

Notary Public

OFFICIAL SEAL
MERRY M FISCHER
NOTARY PUBLIC-OREGON
COMMISSION NO. 449463
MY COMMISSION EXPIRES MAY 24, 2014

Respectfully submitted,

Robert E. Goodman, Jr., Lead Attorney
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Theodore C. Anderson
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104 East Houston Street, Suite 300
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(903) 923-9000; (903) 923-9099 (telecopy)

COUNSEL FOR PLAINTIFFS

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing was served upon Defendant's counsel of record by the method indicated below this 29th day of March, 2013 as follows:

By E-mail and U.S. First Class Mail

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Paul Blankenstein — pblankenstein@gibsondunn.com
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Michael C. Smith — michaelsmith@siebaln.com
Siebman, Burg, Phillips & Smith, LLP
113 East Austin Street
Marshall, Texas 75671

Robert E. Goodman, Jr.

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

MARK T. EDDINGSTON,	§	
JEFFERY M. DAVIS,	§	
ELRIDGE NICHOLAS BOLLICH,	§	
RAY A. COX and GEORGE GALANIS,	§	
	§	
Plaintiffs,	§	Civil Action No. 2:12-CV-00422
	§	
v.	§	
	§	
UBS FINANCIAL SERVICES, INC.,	§	
	§	
Defendant.	§	**JURY TRIAL DEMANDED**

PLAINTIFF, JEFFERY M. DAVIS', ANSWERS TO FIRST AND SECOND SETS OF INTERROGATORIES PROPOUNDED BY DEFENDANT

Plaintiff, Jeffery M. Davis, hereby provides the following answers to Defendant's first and second sets of interrogatories

1. Identify each and every person who assisted you in answering these Interrogatories and in responding to Defendant's First Request for Production of Documents, and specify to which Interrogatory and Document Request and subpart that person provided assistance or input and the nature of such assistance or input.

ANSWER:

I was aided in the answering of these interrogatories by my attorney, Robert E. Goodman, Jr., and his paralegal, Tara Mills.

2. For each person you believe has knowledge of any of the facts underlying any of the claims in the Amended Complaint or the subject matter of this litigation, please state: (a) full name, last known home and business addresses and telephone numbers, and relationship to you; (b) current employer and position and, if formerly employed by Defendant, state when and what position; (c) the facts or information which you believe to be the substance of his or her knowledge and the source of such knowledge; and (d) the identity of any documents which relate to the person's information or knowledge, including without limitation any written statements.

ANSWER:

I am the only individual with knowledge of the underlying facts in the Amended Complaint as they apply to me.

3. Identify each and every person, other than your attorneys, with whom you have discussed the allegations in the Amended Complaint or the subject matter of this litigation, and for each such person, please state: (a) the full name, last known home and business addresses and telephone numbers, and relationship to you; (b) when and where the discussion(s) or communication(s) took place; (c) the identity of each person present during such discussion(s) or

ANSWER:

I have had no discussions other than those involving other Plaintiffs in this action.

4. Identify each person from Defendant who, either individually or as part of a group, communicated with you, orally or in writing, regarding the Plan. For each such person, specify the nature of the communication; the date when the communication took place; what the individual said about the Plan; what statements, if any, you made during the communication; witnesses, if any, to the communication(s); and any notes or documents relating to the communication(s).

ANSWER:

I object to this interrogatory on the ground that the request seeks information that is not relevant in that it requests information related to the merits of the case rather than the issue of class certification. Subject to and without waiving the foregoing objection none.

5. Identify in detail your calculations as to damages and any other relief to which you believe you are entitled and for which you seek redress against Defendant, and for each element of damages or other relief identify: (a) each and every fact upon which you base your entitlement contention; (b) all documents relating or referring to any facts which form the bases of your entitlement contention; (c) each and every person who may have knowledge of the facts underlying your entitlement contention; and (d) each and every document relating to your alleged damages and any other information provided in your answer to this Interrogatory.

ANSWER:

I object to this interrogatory as overly broad and burdensome. The information is possessed and known by Defendant. Subject to and without waiving the foregoing objection, Firm Contributions, Market Interest and Turbo Interest forfeited as calculated by The Newport Group are the basis for my damage calculations. I am attaching a copy of the forfeiture calculation.

6. Identify any person (other than counsel) from whom you or your attorneys have obtained or will obtain a written statement of any kind relating to any fact, allegation, claim, issue or

defense raised in this action. For each such person, describe the substance of such statements. Identify all documents relating to same.

ANSWER:

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7. If, in support of your claims as described in the Amended Complaint, you rely on any specific communications or documents which you contend directly evidence or support your allegations, identify each and every such communication or document.

ANSWER:

I object to this interrogatory on the ground that the request seeks information that is not relevant in that it requests information related to the merits of the case rather than the issue of class certification. Subject to and without waiving the foregoing objection, the documents relied on in support of my claim as described in the Amended Complaint are those referred to in the Amended Complaint and the document referred to in my answer to Interrogatory No. 5.

8. If you contend that Defendant, by any of its officers, agents managers, or employees, has made any admissions or declarations against interest concerning the subject matter of this action, please identify the person making the statement and identify the statement allegedly made (and if in writing, attach a copy).

ANSWER:

I object to this interrogatory on the ground that the request seeks information that is not relevant in that it requests information related to the merits of the case rather than the issue of class certification. Subject to and without waiving the foregoing objection, such persons have not been identified at this time.

9. Describe in detail any communications with potential class members regarding this litigation. For each such person, specify the nature of the communication, the date when the communication took place, what was said by the potential class member, what statements, if any, you made during the communication, witnesses, if any, and any notes you took of the communication.

ANSWER:

None.

10. Identify each person whom you intend to call as a witness at any hearing or trial in this matter.

ANSWER:

I object to this interrogatory on the ground that the request seeks information that is not relevant in that it requests information related to the merits of the case rather than the issue of class certification. Subject to and without waiving the foregoing objection, I have yet to determine who will be called as a witness at any hearing or trial.

11. Identify all employers (including yourself) who have offered you employment or for whom you have worked since your employment with UBS ended and through the date of trial, identifying: the company name, address, and location; the dates you were employed by such other employers (including yourself); your positions with such employers; your supervisors' names and titles; a brief description of your job duties; your rate of pay as well as earnings, compensation and other benefits you received during such employment; and if you left the employment, the reasons for your separation from employment.

ANSWER:

I object to this interrogatory on the ground that the request seeks information that is not relevant to any claim or defense or calculated to lead to admissible evidence relevant to a claim or defense other than information as to my participation in the PartnerPlus Plan. Subject to and without waiving the foregoing objection, the names of, and dates of my employment, with subsequent employers, this information is readily available to you on FINRA BrokerCheck.

12. For all employers identified in response to the foregoing interrogatory, identify and describe your efforts to become employed with such employer, including each person who recruited you; each person who interviewed you; the date you first expressed interest in employment with the employer; your reasons for seeking employment outside UBS; any pre-employment communications with representatives of the employer; any applications or resumes submitted; and your reasons for accepting such employment.

ANSWER:

I object to this interrogatory on the ground that the request seeks information that is not relevant to any claim or defense or calculated to lead to admissible evidence relevant to a claim or defense other than information as to my participation in the PartnerPlus Plan.

VERIFICATION

STATE OF TEXAS §
§
COUNTY OF DALLAS §

Before me, the undersigned Notary Public, personally appeared Jeffery M. Davis, who, being by me duly sworn, deposed and stated that he is a Plaintiff in this action and that the facts stated in the foregoing Plaintiff, Jeffery M. Davis', Answers to First and Second Sets of Interrogatories Propounded by Defendant are within his personal knowledge and are true and correct.

Jeffery M. Davis

SUBSCRIBED AND SWORN TO BEFORE ME this 29 day of March, 2013.

Monica A. Smith
Commission Expires
08-12-2016

Notary Public

Respectfully submitted,

Robert E. Goodman, Jr., Lead Attorney
State Bar No. 08158100
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COUNSEL FOR PLAINTIFFS

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing was served upon Defendant's counsel of record by the method indicated below this 1st day of April, 2013 as follows:

By E-mail and U.S. First Class Mail

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Robert E. Goodman, Jr.

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

MARK T. EDDINGSTON,	§	
JEFFERY M. DAVIS,	§	
ELRIDGE NICHOLAS BOLLICH,	§	
RAY A. COX and GEORGE GALANIS,	§	
	§	
Plaintiffs,	§	Civil Action No. 2:12-CV-00422
	§	
v.	§	
	§	
UBS FINANCIAL SERVICES, INC.,	§	
	§	
Defendant.	§	**JURY TRIAL DEMANDED**

PLAINTIFF, MARK T. EDDINGSTON'S, ANSWERS TO FIRST AND SECOND SETS OF INTERROGATORIES PROPOUNDED BY DEFENDANT

Plaintiff, Mark T. Eddingston, hereby provides the following answers to Defendant's first set of interrogatories

1. Identify each and every person who assisted you in answering these Interrogatories and in responding to Defendant's First Request for Production of Documents, and specify to which Interrogatory and Document Request and subpart that person provided assistance or input and the nature of such assistance or input.

ANSWER:

I was aided in the answering of these interrogatories by my attorneys, Robert E. Goodman, Jr., Theodore C. Anderson and their paralegal, Tara Mills.

2. For each person you believe has knowledge of any of the facts underlying any of the claims in the Amended Complaint or the subject matter of this litigation, please state: (a) full name, last known home and business addresses and telephone numbers, and relationship to you; (b) current employer and position and, if formerly employed by Defendant, state when and what position; (c) the facts or information which you believe to be the substance of his or her knowledge and the source of such knowledge; and (d) the identity of any documents which relate to the person's information or knowledge, including without limitation any written statements.

ANSWER:

I am the only individual with knowledge of the underlying facts in the Amended Complaint as they apply to me.

3. Identify each and every person, other than your attorneys, with whom you have discussed the allegations in the Amended Complaint or the subject matter of this litigation, and for each such person, please state: (a) the full name, last known home and business addresses and telephone numbers, and relationship to you; (b) when and where the discussion(s) or communication(s) took place; (c) the identity of each person present during such discussion(s) or

ANSWER:

I have had no discussions other than those involving other Plaintiffs in this action.

4. Identify each person from Defendant who, either individually or as part of a group, communicated with you, orally or in writing, regarding the Plan. For each such person, specify the nature of the communication; the date when the communication took place; what the individual said about the Plan; what statements, if any, you made during the communication; witnesses, if any, to the communication(s); and any notes or documents relating to the communication(s).

ANSWER:

I object to this interrogatory on the ground that the request seeks information that is not relevant in that it requests information related to the merits of the case rather than the issue of class certification. Subject to and without waiving the foregoing objection, I have had no discussions other than those involving other Plaintiffs in this action.

5. Identify in detail your calculations as to damages and any other relief to which you believe you are entitled and for which you seek redress against Defendant, and for each element of damages or other relief identify: (a) each and every fact upon which you base your entitlement contention; (b) all documents relating or referring to any facts which form the bases of your entitlement contention; (c) each and every person who may have knowledge of the facts underlying your entitlement contention; and (d) each and every document relating to your alleged damages and any other information provided in your answer to this Interrogatory.

ANSWER:

I object to this interrogatory as overly broad and burdensome. The information is possessed and known by Defendant. Subject to and without waiving the foregoing objection, Firm Contributions, Market Interest and Turbo Interest forfeited as calculated by The Newport Group are the basis for my damage calculations. I am attaching a copy of the forfeiture calculation.

6. Identify any person (other than counsel) from whom you or your attorneys have obtained or will obtain a written statement of any kind relating to any fact, allegation, claim, issue or defense raised in this action. For each such person, describe the substance of such statements. Identify all documents relating to same.

ANSWER:

I object to this interrogatory on the ground that the request seeks information that is not relevant in that it requests information related to the merits of the case rather than the issue of class certification. Subject to and without waiving the foregoing objection, I have not identified any such individuals at this time.

7. If, in support of your claims as described in the Amended Complaint, you rely on any specific communications or documents which you contend directly evidence or support your allegations, identify each and every such communication or document.

ANSWER:

I object to this interrogatory on the ground that the request seeks information that is not relevant in that it requests information related to the merits of the case rather than the issue of class certification. Subject to and without waiving the foregoing objection, the documents relied on in support of my claim as described in the Amended Complaint are those referred to in the Amended Complaint and the document referred to in my answer to Interrogatory No. 5.

8. If you contend that Defendant, by any of its officers, agents managers, or employees, has made any admissions or declarations against interest concerning the subject matter of this action, please identify the person making the statement and identify the statement allegedly made (and if in writing, attach a copy).

ANSWER:

I object to this interrogatory on the ground that the request seeks information that is not relevant in that it requests information related to the merits of the case rather than the issue of class certification. Subject to and without waiving the foregoing objection, such persons have not been identified at this time.

9. Describe in detail any communications with potential class members regarding this litigation. For each such person, specify the nature of the communication, the date when the communication took place, what was said by the potential class member, what statements, if any, you made during the communication, witnesses, if any, and any notes you took of the communication.

ANSWER:

None.

10. Identify each person whom you intend to call as a witness at any hearing or trial in this matter.

ANSWER:

I object to this interrogatory on the ground that the request seeks information that is not relevant in that it requests information related to the merits of the case rather than the issue of class certification. Subject to and without waiving the foregoing objection, I have yet to determine who will be called as a witness at any hearing or trial.

11. Identify all employers (including yourself) who have offered you employment or for whom you have worked since your employment with UBS ended and through the date of trial, identifying: the company name, address, and location; the dates you were employed by such other employers (including yourself); your positions with such employers; your supervisors' names and titles; a brief description of your job duties; your rate of pay as well as earnings, compensation and other benefits you received during such employment; and if you left the employment, the reasons for your separation from employment.

ANSWER:

I object to this interrogatory on the ground that the request seeks information that is not relevant to any claim or defense or calculated to lead to admissible evidence relevant to a claim or defense other than information as to my participation in the PartnerPlus Plan. Subject to and without waiving the foregoing objection, the names of, and dates of my employment, with subsequent employers, this information is readily available to you on FINRA BrokerCheck.

12. For all employers identified in response to the foregoing interrogatory, identify and describe your efforts to become employed with such employer, including each person who recruited you; each person who interviewed you; the date you first expressed interest in employment with the employer; your reasons for seeking employment outside UBS; any pre-employment communications with representatives of the employer; any applications or resumes submitted; and your reasons for accepting such employment.

ANSWER:

I object to this interrogatory on the ground that the request seeks information that is not relevant to any claim or defense or calculated to lead to admissible evidence relevant to a claim or defense other than information as to my participation in the PartnerPlus Plan.

VERIFICATION

STATE OF TEXAS §
§
COUNTY OF JEFFSERON §

Before me, the undersigned Notary Public, personally appeared Mark T. Eddingston, who, being by me duly sworn, deposed and stated that he is a Plaintiff in this action and that the facts stated in the foregoing Plaintiff, Mark T. Eddingston's, Answers to First and Second Sets of Interrogatories Propounded by Defendant are within his personal knowledge and are true and correct.

Mark T. Eddingston

SUBSCRIBED AND SWORN TO BEFORE ME this 28 day of March, 2013.

Notary Public

BRANDY DAWN HEAD
My Commission Expires
January 14, 2015

Respectfully submitted,

Theodore C. Anderson
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Robert E. Goodman, Jr., Lead Attorney
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COUNSEL FOR PLAINTIFFS

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing was served upon Defendant's counsel of record by the method indicated below this 27th day of March, 2013 as follows:

By E-mail and U.S. First Class Mail

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113 East Austin Street
Marshall, Texas 75671

Theodore C. Anderson

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

BILL HENDRICKS and AUBREY B. STACY,	§	
Plaintiffs,	§	
V.	§	Civil Action No. 2:12-CV-00606
UBS FINANCIAL SERVICES, INC.	§	
Defendant.	§	

PLAINTIFF, BILL HENDRICKS', ANSWERS TO FIRST AND SECOND SETS OF INTERROGATORIES PROPOUNDED BY DEFENDANT

Plaintiff, Bill Hendricks, hereby provides the following answers to Defendant's first set of interrogatories

1. Identify each and every person who assisted you in answering these Interrogatories and in responding to Defendant's First Request for Production of Documents, and specify to which Interrogatory and Document Request and subpart that person provided assistance or input and the nature of such assistance or input.

ANSWER:

I was aided in the answering of these interrogatories by my attorneys, Robert E. Goodman, Jr., Theodore C. Anderson and their paralegal, Tara Mills.

2. For each person you believe has knowledge of any of the facts underlying any of the claims in the Amended Complaint or the subject matter of this litigation, please state: (a) full name, last known home and business addresses and telephone numbers, and relationship to you; (b) current employer and position and, if formerly employed by Defendant, state when and what position; (c) the facts or information which you believe to be the substance of his or her knowledge and the source of such knowledge; and (d) the identity of any documents which relate to the person's information or knowledge, including without limitation any written statements.

ANSWER:

I am the only individual with knowledge of the underlying facts in the Amended Complaint as they apply to me.

3. Identify each and every person, other than your attorneys, with whom you have discussed the allegations in the Amended Complaint or the subject matter of this litigation, and for each such person, please state: (a) the full name, last known home and business addresses and telephone numbers, and relationship to you; (b) when and where the discussion(s) or communication(s) took place; (c) the identity of each person present during such discussion(s) or

ANSWER:

I have had no discussions other than those involving other Plaintiffs in this action.

4. Identify each person from Defendant who, either individually or as part of a group, communicated with you, orally or in writing, regarding the Plan. For each such person, specify the nature of the communication; the date when the communication took place; what the individual said about the Plan; what statements, if any, you made during the communication; witnesses, if any, to the communication(s); and any notes or documents relating to the communication(s).

ANSWER:

I object to this interrogatory on the ground that the request seeks information that is not relevant in that it requests information related to the merits of the case rather than the issue of class certification. Subject to and without waiving the foregoing objection, I had communication with the following individuals regarding the Plan, copies of which are being concurrently produced with my responses to Defendant's First and Second Requests for Production.

a. Jerome A. Lichtstein, Executive Vice President – July 17, 1995
b. Jerome A. Lichtstein, Executive Vice President – November 9, 1995
c. John Wethington – November 21, 1995
d. Ron Safir – February 16, 1996
e. Jerome A. Lichtstein, Executive Vice President – March 14, 1996
f. Tim McDonnell – 1998
g. Michael A. Davis, Executive Vice President – March 10, 1999
h. Jane Eisland, Director of Compensation – 2001
i. Jane Eisland, Director of Compensation – March 3, 2008
j. Tony Tarrab, Regional Manager – July 30, 2008
k. Justin Steers, Market Area Manager – July 30, 2008

5. Identify in detail your calculations as to damages and any other relief to which you believe you are entitled and for which you seek redress against Defendant, and for each element

of damages or other relief identify: (a) each and every fact upon which you base your entitlement contention; (b) all documents relating or referring to any facts which form the bases of your entitlement contention; (c) each and every person who may have knowledge of the facts underlying your entitlement contention; and (d) each and every document relating to your alleged damages and any other information provided in your answer to this Interrogatory.

ANSWER:

I object to this interrogatory as overly broad and burdensome. The information is possessed and known by Defendant. Subject to and without waiving the foregoing objection, Firm Contributions, Market Interest and Turbo Interest forfeited as calculated by The Newport Group are the basis for my damage calculations. I am attaching a copy of the forfeiture calculation.

6. Identify any person (other than counsel) from whom you or your attorneys have obtained or will obtain a written statement of any kind relating to any fact, allegation, claim, issue or defense raised in this action. For each such person, describe the substance of such statements. Identify all documents relating to same.

ANSWER:

I object to this interrogatory on the ground that the request seeks information that is not relevant in that it requests information related to the merits of the case rather than the issue of class certification. Subject to and without waiving the foregoing objection, I have not identified any such individuals at this time.

7. If, in support of your claims as described in the Amended Complaint, you rely on any specific communications or documents which you contend directly evidence or support your allegations, identify each and every such communication or document.

ANSWER:

I object to this interrogatory on the ground that the request seeks information that is not relevant in that it requests information related to the merits of the case rather than the issue of class certification. Subject to and without waiving the foregoing objection, the documents relied on in support of my claim as described in the Amended Complaint are those referred to in the Amended Complaint and the document referred to in my answer to Interrogatory No. 5.

8. If you contend that Defendant, by any of its officers, agents managers, or employees, has made any admissions or declarations against interest concerning the subject matter of this action, please identify the person making the statement and identify the statement allegedly made (and if in writing, attach a copy).

ANSWER:

I object to this interrogatory on the ground that the request seeks information that is not relevant in that it requests information related to the merits of the case rather than the issue of class certification. Subject to and without waiving the foregoing objection, such persons have not been identified at this time.

9. Describe in detail any communications with potential class members regarding this litigation. For each such person, specify the nature of the communication, the date when the communication took place, what was said by the potential class member, what statements, if any, you made during the communication, witnesses, if any, and any notes you took of the communication.

ANSWER:

None.

10. Identify each person whom you intend to call as a witness at any hearing or trial in this matter.

ANSWER:

I object to this interrogatory on the ground that the request seeks information that is not relevant in that it requests information related to the merits of the case rather than the issue of class certification. Subject to and without waiving the foregoing objection, I have yet to determine who will be called as a witness at any hearing or trial.

11. Identify all employers (including yourself) who have offered you employment or for whom you have worked since your employment with UBS ended and through the date of trial, identifying: the company name, address, and location; the dates you were employed by such other employers (including yourself); your positions with such employers; your supervisors' names and titles; a brief description of your job duties; your rate of pay as well as earnings, compensation and other benefits you received during such employment; and if you left the employment, the reasons for your separation from employment.

ANSWER:

I object to this interrogatory on the ground that the request seeks information that is not relevant to any claim or defense or calculated to lead to admissible evidence relevant to a claim or defense other than information as to my participation in the PartnerPlus Plan. Subject to and without waiving the foregoing objection, the names of, and dates of my employment, with subsequent employers, this information is readily available to you on FINRA BrokerCheck.

12. For all employers identified in response to the foregoing interrogatory, identify and describe your efforts to become employed with such employer, including each person who recruited you; each person who interviewed you; the date you first expressed interest in employment with the employer; your reasons for seeking employment outside UBS; any pre-employment communications with representatives of the employer; any applications or resumes submitted; and your reasons for accepting such employment.

ANSWER:

I object to this interrogatory on the ground that the request seeks information that is not relevant to any claim or defense or calculated to lead to admissible evidence relevant to a claim or defense other than information as to my participation in the PartnerPlus Plan.

VERIFICATION

STATE OF CALIFORNIA §
§
COUNTY OF SACRAMENTO §

Before me, the undersigned Notary Public, personally appeared Bill Hendricks, who, being by me duly sworn, deposed and stated that he is a Plaintiff in this action and that the facts stated in the foregoing Plaintiff, Bill Hendricks', Answers to First and Second Sets of Interrogatories Propounded by Defendant are within his personal knowledge and are true and correct.

Bill Hendricks

SUBSCRIBED AND SWORN TO BEFORE ME this 27 day of March, 2013.

JASMEET AHLUWALIA
COMM. # 1960337
NOTARY PUBLIC - CALIFORNIA
SACRAMENTO COUNTY
COMM. EXPIRES DEC. 10, 2015

Notary Public

Respectfully submitted,

____
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Robert E. Goodman, Jr., Lead Attorney
State Bar No. 08158100
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COUNSEL FOR PLAINTIFFS

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing was served upon Defendant's counsel of record by the method indicated below this 27th day of March, 2013 as follows:

By E-mail and U.S. First Class Mail

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Theodore C. Anderson

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

BILL HENDRICKS and AUBREY B. STACY, Plaintiffs, V. UBS FINANCIAL SERVICES, INC. Defendant.	§ § § § § § § § § §	Civil Action No. 2:12-CV-00606

PLAINTIFF, AUBREY B. STACY'S, ANSWERS TO FIRST SET OF INTERROGATORIES PROPOUNDED BY DEFENDANT

Plaintiff, Aubrey B. Stacy, hereby provides the following answers to Defendant's first set of interrogatories

1. Identify each and every person who assisted you in answering these Interrogatories and in responding to Defendant's First Request for Production of Documents, and specify to which Interrogatory and Document Request and subpart that person provided assistance or input and the nature of such assistance or input.

ANSWER:

I was aided in the answering of these interrogatories by my attorneys, Robert E. Goodman, Jr., Theodore C. Anderson and their paralegal, Tara Mills.

2. For each person you believe has knowledge of any of the facts underlying any of the claims in the Amended Complaint or the subject matter of this litigation, please state: (a) full name, last known home and business addresses and telephone numbers, and relationship to you; (b) current employer and position and, if formerly employed by Defendant, state when and what position; (c) the facts or information which you believe to be the substance of his or her knowledge and the source of such knowledge; and (d) the identity of any documents which relate to the person's information or knowledge, including without limitation any written statements.

ANSWER:

I am the only individual with knowledge of the underlying facts in the Amended Complaint as they apply to me.

3. Identify each and every person, other than your attorneys, with whom you have discussed the allegations in the Amended Complaint or the subject matter of this litigation, and for each such person, please state: (a) the full name, last known home and business addresses and telephone numbers, and relationship to you; (b) when and where the discussion(s) or communication(s) took place; (c) the identity of each person present during such discussion(s) or

ANSWER:

I have had no discussions other than those involving other Plaintiffs in this action.

4. Identify each person from Defendant who, either individually or as part of a group, communicated with you, orally or in writing, regarding the Plan. For each such person, specify the nature of the communication; the date when the communication took place; what the individual said about the Plan; what statements, if any, you made during the communication; witnesses, if any, to the communication(s); and any notes or documents relating to the communication(s).

ANSWER:

I object to this interrogatory on the ground that the request seeks information that is not relevant in that it requests information related to the merits of the case rather than the issue of class certification. Subject to and without waiving the foregoing objection, I have had no discussions other than those involving other Plaintiffs in this action.

5. Identify in detail your calculations as to damages and any other relief to which you believe you are entitled and for which you seek redress against Defendant, and for each element of damages or other relief identify: (a) each and every fact upon which you base your entitlement contention; (b) all documents relating or referring to any facts which form the bases of your entitlement contention; (c) each and every person who may have knowledge of the facts underlying your entitlement contention; and (d) each and every document relating to your alleged damages and any other information provided in your answer to this Interrogatory.

ANSWER:

I object to this interrogatory as overly broad and burdensome. The information is possessed and known by Defendant. Subject to and without waiving the foregoing objection, Firm Contributions, Market Interest and Turbo Interest forfeited as calculated by The Newport Group are the basis for my damage calculations. I am attaching a copy of the forfeiture calculation.

6. Identify any person (other than counsel) from whom you or your attorneys have obtained or will obtain a written statement of any kind relating to any fact, allegation, claim, issue or defense raised in this action. For each such person, describe the substance of such statements. Identify all documents relating to same.

ANSWER:

I object to this interrogatory on the ground that the request seeks information that is not relevant in that it requests information related to the merits of the case rather than the issue of class certification. Subject to and without waiving the foregoing objection, I have not identified any such individuals at this time.

7. If, in support of your claims as described in the Amended Complaint, you rely on any specific communications or documents which you contend directly evidence or support your allegations, identify each and every such communication or document.

ANSWER:

I object to this interrogatory on the ground that the request seeks information that is not relevant in that it requests information related to the merits of the case rather than the issue of class certification. Subject to and without waiving the foregoing objection, the documents relied on in support of my claim as described in the Amended Complaint are those referred to in the Amended Complaint and the document referred to in my answer to Interrogatory No. 5.

8. If you contend that Defendant, by any of its officers, agents managers, or employees, has made any admissions or declarations against interest concerning the subject matter of this action, please identify the person making the statement and identify the statement allegedly made (and if in writing, attach a copy).

ANSWER:

I object to this interrogatory on the ground that the request seeks information that is not relevant in that it requests information related to the merits of the case rather than the issue of class certification. Subject to and without waiving the foregoing objection, such persons have not been identified at this time.

9. Describe in detail any communications with potential class members regarding this litigation. For each such person, specify the nature of the communication, the date when the communication took place, what was said by the potential class member, what statements, if any, you made during the communication, witnesses, if any, and any notes you took of the communication.

ANSWER:

None.

10. Identify each person whom you intend to call as a witness at any hearing or trial in this matter.

ANSWER:

I object to this interrogatory on the ground that the request seeks information that is not relevant in that it requests information related to the merits of the case rather than the issue of class certification. Subject to and without waiving the foregoing objection, I have yet to determine who will be called as a witness at any hearing or trial.

11. Identify all employers (including yourself) who have offered you employment or for whom you have worked since your employment with UBS ended and through the date of trial, identifying: the company name, address, and location; the dates you were employed by such other employers (including yourself); your positions with such employers; your supervisors' names and titles; a brief description of your job duties; your rate of pay as well as earnings, compensation and other benefits you received during such employment; and if you left the employment, the reasons for your separation from employment.

ANSWER:

I object to this interrogatory on the ground that the request seeks information that is not relevant to any claim or defense or calculated to lead to admissible evidence relevant to a claim or defense other than information as to my participation in the PartnerPlus Plan. Subject to and without waiving the foregoing objection, the names of, and dates of my employment, with subsequent employers, this information is readily available to you on FINRA BrokerCheck.

12. For all employers identified in response to the foregoing interrogatory, identify and describe your efforts to become employed with such employer, including each person who recruited you; each person who interviewed you; the date you first expressed interest in employment with the employer; your reasons for seeking employment outside UBS; any pre-employment communications with representatives of the employer; any applications or resumes submitted; and your reasons for accepting such employment.

ANSWER:

I object to this interrogatory on the ground that the request seeks information that is not relevant to any claim or defense or calculated to lead to admissible evidence relevant to a claim or defense other than information as to my participation in the PartnerPlus Plan.

VERIFICATION

STATE OF TEXAS §
§
COUNTY OF TARRANT §

Before me, the undersigned Notary Public, personally appeared Aubrey B. Stacy, who, being by me duly sworn, deposed and stated that he is a Plaintiff in this action and that the facts stated in the foregoing Plaintiff, Aubrey B. Stacy's, Answers to First Set of Interrogatories Propounded by Defendant are within his personal knowledge and are true and correct.

Aubrey B. Stacy

SUBSCRIBED AND SWORN TO BEFORE ME this 27th day of March, 2013.

NOTARY PUBLIC
STATE OF TEXAS
DAMAH RANKIN
My Commission Expires
January 18, 2015

Notary Public

Respectfully submitted,

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CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing was served upon Defendant's counsel of record by the method indicated below this 27th day of March, 2013 as follows:

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